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March 6, 2020

VIA ELECTRONIC FILING

The Honorable Sarah Netburn, United States Magistrate Judge
United States District Court, Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Courtroom 219
New York, NY 10007

Re: *Ronald Purnell v. NYC HRA P.O. Natasha Blount, et al.*
Docket No.: 18-CV-11758(ALC)(SN)

Dear Judge Netburn:

This office represents defendants NYC HRA P.O. Natasha Blount (“Officer Blount”) and The City of New York (“City”) (collectively, “City defendants”) in the above-referenced matter. We submit this letter on behalf of all parties pursuant to Your Honor’s Civil Case Management Plan & Scheduling Order, dated January 7, 2020.

The depositions of all parties remain outstanding. The parties intend to conduct depositions as follows:

- Plaintiff on March 20, 2020;
- Officer Blount on April 3, 2020;
- Juan Helly on April 9, 2020; and
- Dominic Graham on April 9, 2020.

With respect to expert discovery, the defendants intend to retain medical experts to conduct independent medical examinations of Plaintiff based upon the injuries alleged. Additionally, the defendants reserve their right to call liability experts pending the completion of discovery. Plaintiff intends to call a medical expert.

As to documentary discovery, Plaintiff shall provide responses to the City defendants’ and the FJC defendants’ First Request for Production of Documents and First Set of Interrogatories by March 9, 2020. The FJC defendants shall provide responses to Plaintiff’s First Request for Production of Documents and First Set of Interrogatories by March 9, 2020. The City defendants

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served their responses to Plaintiff's First Request for Production of Documents and First Set of Interrogatories on March 6, 2020.

Respectfully submitted,

GORDON REES SCULLY
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CC: (VIA ELECTRONIC FILING)

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